

Leonard Kruse, P.C.
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Bloomfield Hills, MI 48302
248.594.7500 Fax: 248.594.7501

November 29, 2006

United States Bankruptcy Court
Attn: Mary Lopez
One Bowling Green
New York, New York 10004-1408

RE: Delphi Automotive Systems, LLC
Case no.: 05-44481
Claim no.: 5119
Our File: 6384

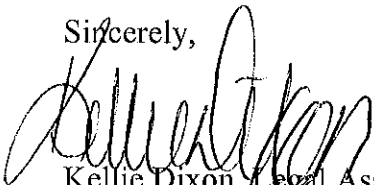
Dear Clerk:

Enclosed for filing, please find the following documents in regard to the above-referenced matter:

1. Motion for Leave to File Under Seal (w/Proof of Service);
2. Notice of Hearing; and
3. Proof of Service.

Please process these documents in accordance with your usual manner and place this motion on the docket for January 11, 2007.

Sincerely,



Kellie Dixon, Legal Assistant

/ked
Enclosures

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF:

DELPHI CORPORATION,

Chapter 11

Case No.: 05-44481 (RDD)

Debtor.

MOTION FOR LEAVE TO FILE UNDER SEAL

Now comes Harold Woodson by and through his attorneys, Leonard Kruse, P.C., and as and for his Motion for Leave to File Under Seal states as follows:

Delphi Corporation filed an objection to Harold Woodson's claim in this matter.

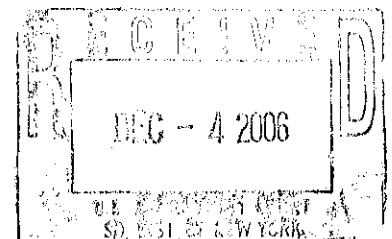
In response to this objection, Mr. Woodson sought to file a brief under seal.

Mr. Woodson's claim arises out of a lawsuit which was filed in the Genesee County, Michigan Circuit County.

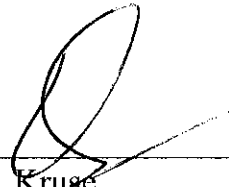
During the pendency of the Genesee County case, a protective order was entered by the Court which required the parties to file under seal any motion or brief that included certain information produced by Delphi in connection with discovery responses provided by Delphi. See a copy of the Protective Order attached hereto as Exhibit A.

In order to properly respond to the objection filed by Delphi to Mr. Woodson's claim, it is necessary for Mr. Woodson to include documents covered by the Protective Order.

In order to comply with the Protective Order, it is necessary for Mr. Woodson to file his Brief in Response to Delphi's Objection under seal.



WHEREFORE, your Claimant, Harold Woodson, prays that this Honorable Court enter an order granting Claimant, Harold Woodson, leave to file his Brief in Response to Objection under Seal. Claimant, Harold Woodson, further prays for such other and further relief in the premises as the Court may deem just and equitable.

By: 
Kelly A. Kruse
Attorney for Claimant

Dated: November 29, 2006

PROOF OF SERVICE

Kellie Dixon certifies that a copy of this instrument was served upon all of the attorneys on record for all of the parties in this within cause, by mailing same to their attention at their respective business addresses with postage fully prepaid thereon on **November 29, 2006**. I declare under penalty of perjury that the above statement is true to the best of my information, knowledge and belief.

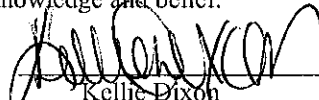

Kellie Dixon

Exhibit A

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF GENESEE

HAROLD WOODSON,

Plaintiff,

v

File No. 04-80177-CZ

DELPHI AUTOMOTIVE SYSTEMS,
L.L.C.,

HON. ROBERT M. RANSOM

Defendant.

Kelly A. Kruse (P 45538)
Norbert Leonard (P 40056)
LEONARD KRUSE, P.C.
Attorneys for Plaintiff
4190 Telegraph Road
Suite 3500
Bloomfield Hills, MI 48302
(248) 594-7500

William R. Schulz (P 29147)
FOSTER, SWIFT, COLLINS & SMITH, P.C.
Attorney for Defendant
313 S. Washington Square
Lansing, MI 48933
(517) 371-8100

A TRUE COPY
Michael J. Carr, Clerk

**STIPULATION AND ORDER FOR THE PROTECTION OF
CONFIDENTIAL/PROPRIETARY INFORMATION**

The Plaintiff, Harold Woodson, and the Defendant, Delphi Automotive Systems, L.L.C., hereafter collectively referred to as "the Parties," agree that information and documents produced in response to the Parties' discovery requests

may contain confidential or proprietary information. Therefore, the Parties stipulate that the Court may enter an Order protecting information and documents produced in this case as follows:

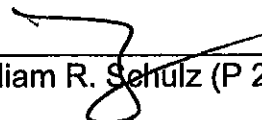
1. Until further Order of the Court or stipulation of the Parties, information and documents produced during discovery in this matter and marked "Confidential" shall be subject to the provisions of this Protective Order.
2. Except as provided in paragraph 3, information and documents marked "Confidential" shall be made available only to the Parties, the Parties' attorneys, the Parties' legal assistants, witnesses at depositions ^{↓ trial} and any expert witnesses retained by the Parties.
3. The Parties and their attorneys may make information and documents marked "Confidential" available to persons other than those authorized in paragraph 2 only after obtaining the written consent of the other Party's attorney and only after the person to whom the information and documents are to be disclosed agrees in writing to be bound by this Order.
4. Information and documents marked "Confidential" shall not be reproduced except as required for case evaluation, mediation, preparation for trial, trial, and appeals; provided, however, that copies, excerpts and summaries may be shown or given to those authorized herein.
5. No person that examines any information or documents marked "Confidential" shall disseminate orally, in writing or by any other means any information whatsoever to any person not also authorized herein.
6. Upon final termination of this action, including all appeals, the

Parties' attorney shall return all information and documents marked "Confidential," including all copies, excerpts or summaries thereof, to the Party that produced the information and documents, or may cause the same to be destroyed and report to the producing party by affidavit the date and manner of destruction.

LEONARD KRUSE, P.C.
Attorneys for Plaintiff

Dated: 3/10/05 By 
Kelly A. Kruse (P 45538)

FOSTER, SWIFT, COLLINS & SMITH, P.C.
Attorneys for Defendant

Dated: 3/23/05 By 
William R. Schulz (P 29147)

**ORDER FOR THE PROTECTION OF
CONFIDENTIAL/PROPRIETARY INFORMATION**

PRESENT: THE HONORABLE ROBERT M. RANSOM, Circuit Judge.

The Court having read and considered the Stipulation herein, and t
he Court being fully advised in the premises; now, therefore,

IT IS SO ORDERED.

Dated: 3/30/05
ROBERT M. RANSOM
P-19226

ROBERT M. RANSOM, Circuit Judge

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF:

DELPHI CORPORATION,

Debtor.

Chapter 11

Case No.: 05-44481 (RDD)

_____ /

NOTICE OF HEARING

PLEASE TAKE NOTICE that the attached Motion for Leave to File Under Seal will be brought on for hearing before the Honorable Drain in his courtroom, on January 11, 2007 at 10:00 a.m., or as soon thereafter as counsel may be heard.

LEONARD KRUSE, P.C.

By: _____

Kelly A. Kruse (P45538)
Attorney for Plaintiff

Dated: November 29, 2006

